

August 25, 1986

CERTIFIED MAIL:

P 447 526 756

Ms. Bonnie Eleder, Remedial Project Manager
U. S. Environmental Protection Agency
Region V - 5HE-12
230 South Dearborn Street
Chicago, IL 60604

Dear Ms. Eleder:

Re: United States of America vs. BASF Wyandotte Corp., No. 80-73699

This letter is in response to the referenced letter from Mr. Constantelos regarding proposed wells 7 and 8 and shallow well 4 as described in the Consent Decree.

Sections V and XIV of the Consent Decree recognize the potential for dry holes and provide that dry holes be managed pursuant to Michigan Law. Said law requires that such holes be plugged pursuant to established regulations. Both well 8 and shallow well 4 were installed, but subsequently became dry holes. These two wells were thus plugged in accordance with these regulations.

The upgradient well 7 (10) was drilled several times. Each time it was clear to Company, State and EPA field representatives that the hole would be dry. These field representatives collectively concluded that there was no purpose in pursuing further attempts to install an upgradient well. See my May 8th answer to question 4 of your March 31, 1986 letter.

The Project Coordinators for both the State (Mr. Shauver) and EPA (Mr. Miller) participated in the decision not to pursue further the installation of an upgradient well. In addition, BASF's final certification that monitor wells had been completed, dated July 15, 1985, was not objected to by EPA within the 60-day period provided by the Consent Decree. In conclusion, we believe your most recent request to install the referenced wells is both inconsistent with the understanding previously reached among the parties and impractical given the hydrogeologic conditions which have been encountered at the site.

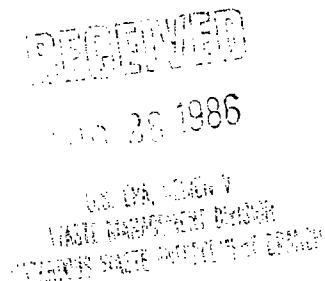
Yours very truly,



C. W. Axce
General Manager - Wyandotte

mh

cc: LLipinski, MDNR
VLoselle, MDNR
JShauver, MDNR



August 25, 1986

Mr. L. Lipinski
Groundwater Division
Michigan Dept. Natural Resources
P. O. Box 30028
Lansing, MI 48909

Dear Mr. Lipinski:

I have attached copy of letter we received recently from the EPA regarding the monitor wells at the Riverview property. I have also attached a copy of our response to Ms. Bonnie Eleder.

If you have any questions or comments, please advise.

Yours very truly,



C. W. Axce
General Manager
Wyandotte

mh
attachments

cc: VLoselle, MDNR
JShauver, MDNR
BEleder, USEPA

BE



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

AUG 15 1986

REPLY TO THE ATTENTION OF:
SCS-16

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. C.W. Axce
General Manager
Wyandotte Works
BASF Corporation
1609 Biddle Avenue
Wyandotte, Michigan 48192

Re: United States of America v.
BASF Wyandotte Corporation
No. 80-73699

Dear Mr. Axce:

On July 18, 1984 a Consent Decree was entered into between the United States Environmental Protection Agency (U.S. EPA) and BASF Wyandotte Corporation in settlement of the above-captioned matter. Under the terms of this Consent Decree, BASF Wyandotte Corporation was required to install nine deep monitor wells at its Riverview Site. These nine monitor wells were to be placed at the locations designated in Appendix D of the Consent Decree. In addition to these nine deep monitor wells, this Consent Decree called for the installation of shallow wells at these nine (9) locations if certain water levels were encountered.

U.S. EPA has reviewed your May 8, 1986 letter which describes the wells in place at the BASF Wyandotte Riverview Site. After reviewing this letter U.S. EPA has determined that BASF Wyandotte Corporation is not in compliance with the terms of the Consent Decree. Specifically, the BASF Wyandotte Riverview Site lacks an upgradient well (Well No. 7 in Appendix D of the Consent Decree). In addition, well labeled No. 8 in Appendix D of the Consent Decree is also missing. This well was to monitor the site under the compacted clay cover.

Please respond to this letter within seven (7) days, outlining your plans to install additional monitor wells at locations 7 and 8 of the Consent Decree. In this response, we would also ask that you explain your reasons for removing the Shallow Well located near Well 4 in Appendix D of the Consent Decree. Your response should be sent to Ms. Bonnie Eleder, Remedial Project Manager, U.S. EPA Region V, 5HE-12, 230 South Dearborn

AUG 18 1986

C.W. AXCE

Dearborn Street, Chicago, Illinois 60604. If U.S. EPA does not hear from you within seven days of your receipt of this letter, U.S. EPA will consider taking other appropriate action to enforce the terms of the Consent Decree.

Sincerely,

M.A. Lade

for Basil G. Constantelos
Director, Waste Management Division

cc: Carol L. Green

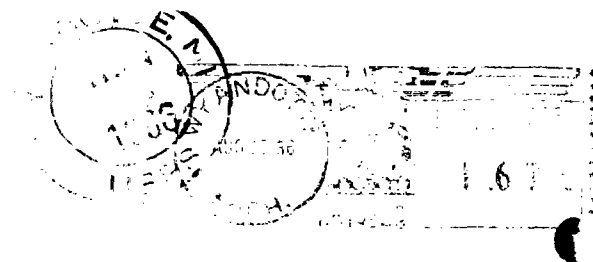
cc: KF. HDR, DS
8/18

BASF Corporation Chemicals Division
1609 Biddle Avenue, Wyandotte, Michigan 48192

BASF

**RETURN RECEIPT
REQUESTED**

P 447 526 756



Ms. Bonnie Eleder 5HE-12
Remedial Project Manager
USEPA - Region V
230 South Dearborn Street
Chicago, IL 60604

